

Exhibit C

to June 3, 2020 Reply Letter

From: [Kim, Jane \(USANYS\) 4](#)
To: [Kaveh.Miremadi@treasury.gov](#)
Cc: [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#)
Subject: Fwd: Nejad trial
Date: Thursday, January 23, 2020 10:38:15 AM

Thanks so much, Kaveh. We know things are busy over there. Do you have a couple minutes to talk again? I am traveling but on the way to the airport now. My cell is +1 [REDACTED].
Thank you again.

Begin forwarded message:

From: <Kaveh.Miremadi@treasury.gov>
Date: January 23, 2020 at 9:54:42 AM EST
To: <Stephanie.Lake@usdoj.gov>, <MariaHelene.VanWagenberg@treasury.gov>, <Jane.Kim@usdoj.gov>, <Matthew.McGrath@treasury.gov>
Cc: <Michael.Krouse@usdoj.gov>, <LynchG@dany.nyc.gov>
Subject: RE: Nejad trial

Hi everyone, I just got off the phone with Stephanie. I'm adding Enforcement Officer Matt McGrath to this email. He has agreed to serve as the OFAC witness in the trial. I have attached his resume to this email.

Once you all have the internet again, I would appreciate a copy of the indictment.

Thanks,
Kaveh

From: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>
Sent: Wednesday, January 22, 2020 10:16 PM
To: Van Wagenberg, Maria-Helene <MariaHelene.VanWagenberg@treasury.gov>; Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>; Ward, Jonathan <Jonathan.Ward@treasury.gov>
Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov; Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>
Subject: RE: Nejad trial

Thank you. Kaveh – are you free first thing tomorrow morning to discuss this over the phone? We're now past our deadline and may lose the ability to call a witness from OFAC at our trial. This would be very damaging to the case.

From: MariaHelene.VanWagenberg@treasury.gov
<MariaHelene.VanWagenberg@treasury.gov>
Sent: Wednesday, January 22, 2020 6:39 PM
To: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4

<JKim4@usa.doj.gov>; Jonathan.Ward@treasury.gov

Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov;
Kaveh.Miremadi@treasury.gov

Subject: RE: Nejad trial

Hi Stephanie,

Copying Kaveh, a chief in our Enforcement division who is tracking this request. Jon has to be out of the office today for a family emergency, so I know Enforcement has been working on pinning down a replacement and sending you a resume.

From: Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>

Date: January 22, 2020 at 6:14:14 PM EST

To: Van Wagenberg, Maria-Helene

<MariaHelene.VanWagenberg@treasury.gov>, Kim, Jane (USANYS) 4
<Jane.Kim@usdoj.gov>, Ward, Jonathan <Jonathan.Ward@treasury.gov>

Cc: Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>, LynchG@dany.nyc.gov <LynchG@dany.nyc.gov>

Subject: RE: Nejad trial

Hi Maria,

Just checking in on the resume. We really do need this today.

Stephanie

From: Lake, Stephanie (USANYS)

Sent: Wednesday, January 22, 2020 9:16 AM

To: MariaHelene.VanWagenberg@treasury.gov; Kim, Jane (USANYS) 4
<JKim4@usa.doj.gov>; Jonathan.Ward@treasury.gov

Cc: Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov

Subject: RE: Nejad trial

Thanks Maria. Jane and Michael are traveling for the case today and tomorrow – I will let Jane weigh in on when they'll be available for a call. In the interim, can you send me the resume of whoever will be testifying as the OFAC expert? We need to include this in a disclosure that is due today.

From: MariaHelene.VanWagenberg@treasury.gov
<MariaHelene.VanWagenberg@treasury.gov>

Sent: Tuesday, January 21, 2020 4:05 PM

To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Jonathan.Ward@treasury.gov

Cc: Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; LynchG@dany.nyc.gov
Subject: RE: Nejad trial

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Apologies for the delay, as the last week has been exceedingly busy for our office. I'm free tomorrow after 4:30 pm or Thursday afternoon. Thanks and best, Maria

Maria H. van Wagenberg
Attorney-Advisor
Office of the Chief Counsel (Foreign Assets Control)
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220
Email: mariahelene.vanwagenberg@treasury.gov
Tel: 202-622-2070

This message is from an attorney and may contain information that is legally privileged. If you are not the intended recipient, please immediately advise the sender by reply e-mail that this message has been inadvertently transmitted to you and delete this e-mail from your system. Thank you for your cooperation.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Sent: Tuesday, January 21, 2020 2:06 PM
To: Ward, Jonathan <Jonathan.Ward@treasury.gov>
Cc: Van Wagenberg, Maria-Helene <MariaHelene.VanWagenberg@treasury.gov>; Lake, Stephanie (USANYS) <Stephanie.Lake@usdoj.gov>; Krouse, Michael (USANYS) <Michael.Krouse@usdoj.gov>; LynchG@dany.nyc.gov
Subject: Re: Nejad trial

Jon, checking in again. Could you please also send your CV as soon as you can?
Thanks.

On Jan 15, 2020, at 2:57 PM, Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov> wrote:

Jon,

Checking in to see if you and Maria are available tomorrow for a call?

Thanks,
Jane

From: Jonathan.Ward@treasury.gov <Jonathan.Ward@treasury.gov>
Sent: Wednesday, January 8, 2020 1:38 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>

Cc: MariaHelene.VanWagenberg@treasury.gov

Subject: RE: Nejad trial

Appreciate your understanding. Will do.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>

Sent: Wednesday, January 8, 2020 1:36 PM

To: Ward, Jonathan <Jonathan.Ward@treasury.gov>

Cc: Van Wagenberg, Maria-Helene

<MariaHelene.VanWagenberg@treasury.gov>

Subject: RE: Nejad trial

Okay – let us know when you're free. Thanks and good luck.

From: Jonathan.Ward@treasury.gov <Jonathan.Ward@treasury.gov>

Sent: Wednesday, January 8, 2020 1:17 PM

To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>

Cc: MariaHelene.VanWagenberg@treasury.gov

Subject: RE: Nejad trial

Importance: High

Jane,

We would like to reschedule this call until mid / late next week due to an urgent matter which is taking to priority down here.

Thanks,

Jon

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>

Sent: Tuesday, January 7, 2020 2:53 PM

To: Ward, Jonathan <Jonathan.Ward@treasury.gov>

Cc: Van Wagenberg, Maria-Helene

<MariaHelene.VanWagenberg@treasury.gov>

Subject: RE: Nejad trial

Either of those times work for me if they work for Maria. Thanks.

From: Jonathan.Ward@treasury.gov <Jonathan.Ward@treasury.gov>

Sent: Tuesday, January 7, 2020 2:29 PM

To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>

Cc: MariaHelene.VanWagenberg@treasury.gov

Subject: RE: Nejad trial

I have a meeting at 1400, but I could do 1330 or 1500.

-J.W.

From: Kim, Jane (USANYS) 4 <Jane.Kim@usdoj.gov>
Date: January 7, 2020 at 12:34:57 PM EST
To: Ward, Jonathan <Jonathan.Ward@treasury.gov>, Van
Wagenberg, Maria-Helene
<MariaHelene.VanWagenberg@treasury.gov>, Sultoon, Samantha
<Samantha.Sultoon@treasury.gov>
Cc: Miremadi, Kaveh <Kaveh.Miremadi@treasury.gov>
Subject: RE: Nejad trial

Would tomorrow at 2pm work? Thanks.

-----Original Message-----

From: Jonathan.Ward@treasury.gov <Jonathan.Ward@treasury.gov>
Sent: Tuesday, January 7, 2020 12:32 PM
To: Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>;
MariaHelene.VanWagenberg@treasury.gov; Samantha.Sultoon@treasury.gov
Cc: Kaveh.Miremadi@treasury.gov
Subject: RE: Nejad trial

Jane,

OGC, Maria, would like to be on the line for this call. If we could push it until tomorrow or later this week we think that would be best.

-J.W.

<Matthew McGrath - Resume.pdf>